

Message

From: Topinka, Natalie [topinka.natalie@epa.gov]
Sent: 8/28/2019 3:45:42 PM
To: Dickens, Brian [dickens.brian@epa.gov]
Subject: RE: NOV Equitrans Midstream Corp. Multiple Facilities

I think this is worth getting more information about.

I would like to know if these are dehy units that are owned by the midstream company and are typically located just outside the fenceline of the well pads; hence to date they have not been considered part of the wellpad equipment and therefore not covered under the GP 12.1/2 permits and the accompanying LDAR requirements.

We have had citizen complaints about emissions from these units, but didn't believe we had a hook to do anything since they did not have permits, presumably because they were under the de minimis threshold for getting a permit, and we didn't believe they were subject to OOOOa or MACT HH.

I would like to better understand OEPA's determination that these units are subject to OOOOa LDAR provisions and MACT HH. I haven't fully dived into the applicability criteria for dehy units under each of these rules, but I thought it was contingent on the units being present at a natural gas processing plant. So I would also like to know more specifically where these units are located.

If it's true they are subject to OOOOa and HH, then I would think there are violations of those provisions too.

Let me know if you would like me to participate in any call with OEPA about this.

Thanks,

Natalie

From: Dickens, Brian <dickens.brian@epa.gov>
Sent: Wednesday, August 28, 2019 9:54 AM
To: Whitehead, LaDawn <Whitehead.Ladawn@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>
Subject: FW: NOV Equitrans Midstream Corp. Multiple Facilities

LaDawn: For edms

Natalie: I'm trying to grasp this NOV for failing to get permits. Are we to assume the site has been meeting OOOOa (I assume LDAR), and only needs a permit. Or, is this saying they have been doing nothing so far and need a permit...and need to comply with OOOOa (i.e. Ohio didn't go the next step to say, 'you've been in violation of OOOOa all along'). Should I ask Ohio? Is this worth spending time on?

From: Cynthia.Stello@epa.ohio.gov <Cynthia.Stello@epa.ohio.gov>
Sent: Friday, August 23, 2019 10:08 AM
To: James.Kavalec@epa.ohio.gov; John.Paulian@epa.ohio.gov; John.Rochotte@epa.ohio.gov; Dickens, Brian <dickens.brian@epa.gov>
Cc: Sean.Stephenson@epa.ohio.gov
Subject: NOV Equitrans Midstream Corp. Multiple Facilities

Thanks,



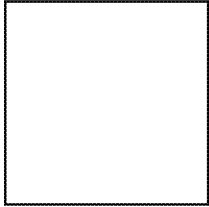
Cynthia L. Stello

District Operations

Southeast District Office

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Did You Know: Children of parents who talk to their teens about drugs are up to 50% less likely to use. Start the conversation: StartTalking.Ohio.Gov

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